



TN0000442
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TN DEPT OF ENVIRONMENT
AND CONSERVATION

OCT 29 2013

DIV OF WATER RESOURCES
RECEIVED

October 25, 2013

Julie A. Harse, P.E.
Environmental Protection Specialist III
10th Floor, William R Snodgrass TN Tower
312 Rosa Parks Ave
Nashville, Tennessee 37243

Re: Request to modify NPDES Permit No. TN0000442

Dear Ms. Harse:

This letter is to follow up on our telephone conversation 10/18/13 regarding a modification to the current NPDES permit. We would like to add tank rinse water as an approved stream to the ponds.

The tank cleaning process involves four steps.

- The tank is drained of any resin product.
- A basic solution of ethylene glycol with up to 15% propylene glycol is added to the tank. It is heated and agitated, effectively removing any residual material.
- The glycol solution is drained from the tank to drums and sent for disposal.
- The cleaned vessel is rinsed with water.

For example, a 1,000 gallon tank would be rinsed with approximately 10,000 pounds of water. This tank rinse water contains residual sodium hydroxide neutralized with sulfuric acid. It is neutralized to pH 4-10.

This cleanout occurs four times a year based on our current production levels. As production increases, this has the potential to increase as well.

Please contact me with any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Elly Olmstead'.

Elly Olmstead
EHS Coordinator
901-861-8349